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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TAMARES LAS VEGAS PROPERTIES,
LLC; PLAZA HOTEL & CASINO, LLC; and
T-UPR, LLC,

Plaintiffs,

vs.

THE TRAVELERS INDEMNITY
COMPANY,

Defendant.

Case No. 2:16-cv-02933-JAD-NJK

**STIPULATION AND ORDER RE:
PAGE LIMITS AND BRIEFING
SCHEDULE CONCERNING
TRAVELERS' INDEMNITY
COMPANY'S MOTION FOR
ATTORNEYS' FEES AND EXPENSES
(ECF No. 265)**

ECF No. 266

STIPULATION

Joshua Mallin, Dennis D'Antonio and Shan Davis, Counsel for Plaintiffs Tamares Las Vegas Properties, LLC, Plaza Hotel & Casino, LLC, and T-UPR, LLC, (collectively "Plaintiffs"

1 Counsel”) and Defendant The Travelers Indemnity Company (“Travelers”), by and through the law
2 firms Clyde & Co LLP and Robinson & Cole LLP, hereby agree and stipulate as follows:

3 1. By Order dated November 22, 2022 this Court “SO ORDERED” a Stipulation
4 governing the briefing schedule and page limits for Travelers’ Motion for Attorney’s Fees
5 and Expenses (ECF No. 265) (“Motion”), the Plaza Plaintiffs’ Opposition thereto, and
6 Travelers’ reply.

7 2. The Motion separately seeks relief against Plaintiffs’ Counsel, pursuant to
8 NRS 7.085, FRCP 37(c), 28 U.S.C. § 1927 and the Court’s inherent power.

9 3. Each of these legal grounds presents differing standards for seeking an award
10 of fees and expenses. Plaintiffs’ Counsel’s Opposition will necessarily include a significant
11 discussion of the underlying facts and procedural history of this matter, including certain
12 pre-suit activity, pretrial discovery practice, motion practice, the trial, and information
13 gathered during recent post-trial discovery as relevant to the relief sought.

14 4. Additionally, and pursuant to Local Rule 54-14, Plaintiffs’ Counsel’s
15 Opposition will address Travelers’ request for attorneys’ fees with thirteen categories of
16 information, which includes a discussion of the fees and costs that Travelers has incurred
17 throughout the lifetime of this matter and Plaintiffs Counsels’ liability for same.

18 5. Travelers and Plaintiffs’ Counsel agree that there is good cause for increasing
19 the page limits of Plaintiffs’ Counsel’s opposition and Travelers’ reply thereto in that the
20 aforementioned subjects cannot be adequately addressed within the page limits prescribed
21 by the Local Rules.

22 6. In light of the foregoing, Travelers and Plaintiffs’ Counsel agree and stipulate
23 as follows:

24 a. Plaintiffs’ Counsel shall file and serve a single, joint opposition to the
25 Motion of no more than 48 pages (excluding exhibits). Said opposition shall be filed on or
26 before January 20, 2023.

b. Travelers may file and serve a reply brief in response to the opposition of Plaintiffs' Counsel on or before February 17, 2023. Said reply shall be limited to 18 pages (excluding exhibits).

7. The Plaintiffs agree to this Stipulation.

Dated: December 8, 2022

Dated: December 8, 2022

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

CLYDE & CO US LLP

/s/ Patrick J. Reilly

/s/ Amy M. Samberg

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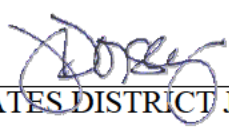
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/s/ Shan Davis

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
December 8, 2022